



356890

20 JAN 1988

RECEIVED

5HE-12

JAN 21 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTEDENVIRONMENTAL REVIEW BRANCH  
PLANNING & MANAGEMENT DIV.

Dr. William Shore  
Rock Island Arsenal  
SMCRI-ENM  
Rock Island, Illinois 61299

Re: Notice of Violation  
Rock Island Arsenal  
IL5 210 021 833

Dear Dr. Shore:

On August 4, 1987, the United States Environmental Protection Agency (U.S. EPA), and the Illinois Environmental Protection Agency (IEPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. Under executive order 12088, Federal agencies have been given the primary responsibility for ensuring compliance of federal facilities under their jurisdiction.

The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions of certain spent solvents. The land disposal restrictions became effective on November 8, 1986, (reference 51 Federal Register 40636: 40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270). A copy of the inspection report is enclosed for your information.

With respect to the land disposal requirements section of the inspection, your facility was found to be in violation of certain land disposal requirements as noted below:

1. Failure to determine whether the waste exceeds treatment standards as required by Section 268.7(a);
2. Failure to correctly determine the appropriate treatability group as required by Section 268.41;
3. Failure to revise waste analysis plan to include 40 CFR Part 268 requirements in accordance with Section 265.13;
4. Failure to maintain complete operating records, that should include analyses and quantities in accordance with Section 265.73; and

5. Failure to identify contents and mark dates on all containers entering storage, as required by Section 268.50(a)(2)(i).

You are hereby requested to submit within (30) calendar days from the date of this letter a written description of actions taken to correct the aforementioned violations. If corrective measures are not properly taken, the problem will be reported to the United States Department of the Army Headquarters for appropriate action, or, if necessary, presented to the Office of Management and Budget for resolution.

If you have any questions regarding this correspondence, please contact Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

**ORIGINAL SIGNED BY:**

**WILLIAM E. MUNO**

William E. Muno, Chief  
RCRA Enforcement Section

Enclosure

cc: Harry Chappel, IEPA  
Glenn Savage, IEPA

✓ bcc: W.D. Franz, ERB  
Paul Dimock